REMARKS

Claim 1, *inter alia*, calls for a pair of analog mixers each outputting a separate audio program, each of said mixers coupled to one of said first and second pairs of digital to analog converters. Thus, the mixers are analog and must be coupled to digital to analog converters for analog mixing.

The cited reference to Kamiya is asserted to teach stereo channel pairs each coupled to a D to A converter, items 1 to 3, in Figure 1. However, the items 1 to 3 are A to D converters, not D to A converters. Similarly, the items pointed to in Figure 4, items 92b and 92c, are not analog mixers, but are digital mixers. This must be so because they receive digital inputs from the items 93d, 93e, 93f, and 93c, for example.

Thus, the rejection is not understood. To the extent that, in the future, any assertion of mere duplication is suggested, it should be noted that there are no per se rules of patentability. But what is occurring here is not duplication. The pair of digital to analog converters are connected differently in that they are connected differently to analog mixers. For example, the mixers must be each connected to one of the first of second pairs of digital to analog converters and the analog to digital converters are coupled to the third channel pair, one of the mixers also coupled to one of the pair of analog to digital converters. Thus, it can be seen that, because of the connections between the elements, mere duplication cannot be asserted.

Therefore, reconsideration is respectfully requested.

On the same basis, the other rejections should be reconsidered.

The rejection of claim 17, based on Kamiya, is not understood since claim 17 calls for converting digital programs to analog format. If anything, Kamiya converts analog programs to digital format. Thus, Kamiya is not relevant.

With respect to the citation of Adams, its pertinency is similarly difficult to understand. Claim 17 calls for changing the assignment of programs to ports. All that Adams does is switch telephone units and ports. It has nothing to do with changing assignments of digital audio programs. Thus, its pertinency is extremely obscure. It certainly teaches nothing about changing the assignment of the two digital audio programs converted to analog format and outputting each of those audio programs to a different port so that the assignment of programs to ports can be changed. Even if switching is known in connection with phone systems, it has nothing to do with a codec as claimed.

In view of these remarks, reconsideration is respectfully requested.

Respectfully submitted,

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